

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD CHAKEJIAN,)	
)	
Plaintiff,)	Civil Action No. 07-2211
)	
v.)	
)	
EQUIFAX INFORMATION SERVICES LLC,)	
)	
Defendant.)	

**DECLARATION OF SHAWN DEGRACE IN SUPPORT OF DEFENDANT EQUIFAX
INFORMATION SERVICES LLC'S MOTION FOR SUMMARY JUDGMENT**

I, Shawn DeGrace, hereby declare under penalty of perjury that the following is true and correct:

1. My name is Shawn DeGrace. I am over 21 years of age and I am competent to testify as to the matters stated herein. I am the Director of Data Management for Equifax Information Services LLC ("Equifax") and have authority to submit this declaration on its behalf.
2. As Director of Data Management I have personal knowledge of the facts herein stated, except to the extent that I state herein another source for my knowledge.
3. Historically, Equifax's employees obtained court records for the company.
4. Since at least the late 1980s, however, Equifax has maintained independent contractor relationships with public records vendors ("PRVs") to gather public record information.
5. Currently, Equifax contracts with a PRV, LexisNexis Risk Data Retrieval Services LLC ("LexisNexis"), whose employees are specifically trained to collect information relating to court filings.

6. The PRV collects information directly from the courthouses where judgments, bankruptcies, and liens are filed, or from other appropriate electronic databases designated by a court as their "official public record."

7. All bankruptcies provided by the PRV must be compiled directly from the appropriate court and not from secondary sources.

8. The use of a PRV is standard practice in the credit reporting industry.

9. If it so chose, Equifax could send an employee to a courthouse to check court records, as it did historically, or could use another conduit – such as an internet service provider if the court has a public website – to obtain the same information transmitted by the PRV.

10. The PRV goes to the original source of the information (generally the courthouse or docket) on Equifax's behalf, re-collects information, and transmits it to Equifax.

11. Equifax requires the PRV to verify all information from the "primary source," defined as the courthouse from which the record was obtained, and prohibits the PRV from using an internal database as a means of verifying a record.

12. Per the term of a contract, the PRV is an independent contractor of Equifax for purposes of obtaining public records.

13. Equifax outsources the activity that it formerly handled itself with direct employees because the PRVs specialize in obtaining and reading court records.

14. Public records are not furnished to Equifax, but instead are obtained by Equifax, through its PRV.

15. Equifax does not provide the name and address of its PRV to consumers in responding to disputes because the PRV is merely acting as Equifax's agent for obtaining public records.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 5th day of March, 2010 at Atlanta, Georgia

By: Shawn DeGrace
Shawn DeGrace